

CHRISTENSEN JAMES & MARTIN

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*Attorneys for California Ironworkers Field Pension Trust,**California Ironworkers Field Welfare Trust, California and**Vicinity Field Ironworkers Annuity Fund, California Field**Ironworkers Vacation Trust Fund, California Field Ironworkers**Apprenticeship Training and Journeyman Retraining Fund,**Ironworkers Workers' Compensation Trust, California Field**Ironworkers Administrative Trust, and California**Field Ironworkers Labor Management Cooperative Trust***UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

The Trustees of the California
Ironworkers Field Pension Trust,
California Ironworkers Field Welfare
Trust, California and Vicinity Field
Ironworkers Annuity Fund, California
Field Ironworkers Vacation Trust Fund,
California Field Ironworkers
Apprenticeship Training and Journeyman
Retraining Fund, Ironworkers Workers'
Compensation Trust, California Field
Ironworkers Administrative Trust, and
California Field Ironworkers Labor
Management Cooperative Trust,

Plaintiffs,

vs.

Freyssinet, Inc., a Delaware corporation;
Western Surety Company, a South
Dakota Company; M. A. Mortenson
Company, a Minnesota corporation;

Case No.: 2:20-cv-01519-RFB-EJY

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT RAYDEO
ENTERPRISES, INC. TO ANSWER
AMENDED COMPLAINT**

1 McCarthy Building Companies, Inc., a
2 Missouri corporation; Federal Insurance
3 Company, an Illinois corporation; and
4 Mortenson-McCarthy Las Vegas
5 Stadium, a Joint Venture, a general
6 partnership; Merchants Bonding
7 Company, an Iowa Company; Travelers
8 Casualty and Surety Company of
9 America, a Connecticut surety; Raydeo
Enterprises, Inc., a Georgia Corporation;
Suretec Insurance Company, a Texas
surety; John Does I-XX, inclusive; and
Roe Entities I-XX, inclusive,

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11 Defendants.

12 IT IS HEREBY STIPULATED by the parties, by and through their undersigned counsel
13 of record, pursuant to LR IA 6.1, that Defendant Raydeo Enterprises, Inc., shall have up to and
14 including **September 27, 2021** within which to answer or otherwise respond to the Complaint.
15 Defendant Raydeo Enterprises, Inc. was served on **August 28, 2021**, so its response would be due
16 on **September 20, 2021**.

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1 Good cause exists to extend the time within which to file a responsive pleading. The
 2 requested extension will provide the parties with the opportunity to further explore settlement
 3 negotiations. This is the first stipulation to extend the time by which Defendant must answer the
 4 complaint.

5 Dated this 17th day of September, 2021.

7 CHRISTENSEN JAMES & MARTIN

FLINT CONNOLLY & WALKER, LLP

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18 IT IS SO ORDERED:

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 20 UNITED STATES MAGISTRATE JUDGE

21 Dated: September 20, 2021